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November 29, 2024

By ECF

Hon. Andrew L. Carter Jr.
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: SEC v. Zhabilov, et al., Civ-A-No. 1:24-cv-07362

Dear Judge Carter:

We write on behalf of Defendants Stephen E. Apolant and Sky-Direct LLC, and Relief Defendants NY Farms Group, Inc. and Equity Markets ADV LLC (together, the “Apolant Defendants”), to request an extension of time to respond to the complaint from December 2, 2024, to December 9. Plaintiff SEC consents to this request.

As other defendants have set forth in their letters filed today, this request is intended to put the defendants on the same schedule to respond to the complaint. This is the Apolant Defendants’ first request to extend this deadline. On or before their answer date, the Apolant Defendants intend to submit a pre-motion letter regarding a motion to dismiss the claims against them.

We thank the Court for its attention to this matter.

Respectfully,

s/ David N. Cinotti
David N. Cinotti

cc: Counsel of record